

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X Via ECF

MARILYN BERNARD, :
 : 08 CIV 4784 (LAK)
 :
 Plaintiff, :
 :
 -against- :
 :
 JP MORGAN CHASE BANK, N.A., : **DEFENDANT'S RULE 26**
 : **DISCLOSURE**
 : **STATEMENT**
 :
 Defendant. :
 :
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Defendant JPMorgan Chase Bank, N.A., by its attorney, JPMorgan Chase Legal and Compliance Department, Stacey L. Blecher, Assistant General Counsel, as and for its disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual other than Plaintiff likely to have discoverable information that the disclosing party may use to support its claims or defenses:

<u>Name</u>	<u>Address</u>
Travis M. Rieger	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Christine M. Tamney	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Leila V. McConnell	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814

Miriam R. de la Cruz c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814

Leonore E. Chester c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814

The above-named individuals are likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, performance and job responsibilities of other persons under the same management and supervision of Plaintiff during some or all of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's AccessHR file, if any;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Consumer Banking department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant JPMorgan Chase policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendant is not seeking damages at this time from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

RESERVATION OF RIGHTS

Defendant reserves its right to supplement and/or amend its Rule 26 Disclosure Statement if and when it deems it appropriate.

Dated: New York, New York
July 21, 2008

**JPMorgan Chase Legal & Compliance
Department**

By: Stacey L. Blecher (nd)
Stacey L. Blecher, Esq.

Attorney(s) for JPMorgan Chase Bank, N.A.
One Chase Manhattan Plaza, 26th Floor
New York, New York 10081
(212) 552-3814
Stacey.L.Blecher@Chase.com

To: Gabor & Gabor
David G. Gabor, Esq.
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(516) 248-2525
Esqs@Gaborlaw.com

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MARILYN BERNARD,

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JP MORGAN CHASE BANK, N.A.,

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08 CIV. 4784 (LAK)**

**AFFIDAVIT OF
SERVICE**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

STUART BAOZSN, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by JPMorgan Chase Bank, N.A.

That on the 21st day of July, 2008 deponent served the within:

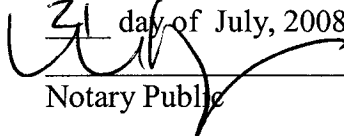
DEFENDANT'S RULE 26 DISCLOSURE STATEMENT

UPON: Gabor & Gabor
David G. Gabor, Esq.
Attorney(s) for Plaintiff
400 Garden City Plaza
Suite 406
Garden City, New York 11530
(516) 248-2525
Esqs@Gaborlaw.com

by the address designed for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



Sworn to before me this
21 day of July, 2008



Notary Public

MARLENE M. THOMPSON
Notary Public, State of New York
No. 01TH6161011
Qualified in Kings County
Certificate filed in New York County
Commission Expires February 12, 2011